SECTION A - ARS SAFETY MANAGEMENT FUNCTION

CHAPTER VI - SAFETY, HEALTH, AND ENVIRONMENTAL

EVALUATION COMPONENT

CHAPTER VI

SAFETY, HEALTH, AND ENVIRONMENTAL EVALUATION COMPONENT

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CHAPTER VI - SECTION A

SAFETY, HEALTH, AND ENVIRONMENTAL EVALUATION COMPONENT

A PURPOSE OF THIS CHAPTER

The contents of this chapter are designed to be a working tool to assist in evaluating the ARS Safety, Health, and Environmental Management Program. It can also be used by those responsible for providing and conducting effective programs. Line officials should find this chapter especially helpful in evaluating the effectiveness of supervisors in carrying out their responsibilities for safety performance on the job.

The attainment of optimal improvement of the safety, health, and environmental management function within ARS is contingent upon improvement of the program components and their constituent project activities. A necessary step utilized to achieve this desired improvement is the determination of present program status through evaluation, including not only accomplishments but targeted areas for program improvement. Quantifiable and qualifiable information must be recorded to accurately determine the value and worth of program components and activities as they relate to previously stated goals and objectives.

B ANNUAL GOALS AND OBJECTIVES (PROGRAM PLANNING)

Once an Area/location has made a commitment to conduct a comprehensive and viable program, it must define exactly what the program expects to achieve. As stated in ARS DIRECTIVE 230.0, the overall program objective (i.e., policy) is to eliminate or minimize losses incurred by the Agency, individual employees, and the general public as a result of actions or incidents involving or producing injury, illness, and property/environmental damage in the ARS workplace.

Specific intermediate objectives need to be developed which will provide the framework for planning, implementing, monitoring, and evaluating program activities. These objectives also provide the bases for resource allocation. They should be clear, specific statements of measurable results that are to be accomplished within a specified time period. Examples of intermediate objectives are:

1 to train all Area/location collateral duty personnel within the next 6 months.

2 to identify the most hazardous occupations within the Area/location within the next 4 months.

B ANNUAL GOALS AND OBJECTIVES (PROGRAM PLANNING) (Continued)

3 to set up the procedures for implementing the ARS Hazard Communication program within the next 90 days.

After objectives are specified, priorities can be established. Since resources may not permit equal attention for all problems, it is expected that Area/locations will address the "worst" problems first or

adopt the current Agencywide emphasis program. In order to set objectives, Areas/locations should collect information from sources such as: onsite inspections, illness and injury records, accident investigation, employee complaints, industrial hygiene sampling and analysis, health hazard appraisal, OIG reports, environmental problems, medical surveillance, etc. Probably more than one source of information needs to be used.

Prior to developing annual program goals/objectives, the responsible official should be able to answer such questions as:

1 Which locations or which jobs have the greatest potential for injury/illness? Of those identified, are emergency controls being effectively used?

2 Which employees need personal protective equipment? What types of personal protective equipment are needed?

3 What was the injury/illness rate and the most frequent type of injury/illness in each major subunit of the location?

4 What is the most costly type of injury/illness? in dollars? in lost time?

5 What is the most frequent employee complaint? What are the hazards most frequently reported, ranked in order of potential hazard?

6 How many accidents were investigated? Of these, how many involved fatalities or hospitalizations of employees?

7 What program activities were suggested by the results of these investigations?

8 Have any efforts been made in previous years to identify location hazards?

B ANNUAL GOALS AND OBJECTIVES (PROGRAM PLANNING) (Continued)

9 Have potential occupational health hazards been identified? If so, has an effective health hazards surveillance program been instituted?

Only after all information is analyzed and synthesized can the question "Which events can be prevented by which type of program activity?" be addressed.

Therefore, in an effort to meet the overall program objective, of eliminating or minimizing losses, each Area/location shall establish annual accident/incident reduction goals by November 30, and develop intermediate objectives (i.e., plan of action) to meet those goals.

C ARS ANNUAL SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT REPORT

The Occupational Safety and Health Act of 1970, Executive Order 12196 and 29 CFR Part 1960 contain provisions requiring ARS and other Federal agencies to submit annual reports concerning our safety, health, and environmental management program to the Occupational Safety and Health Administration (OSHA) through the Department of Agriculture's Office of Finance and Management. OSHA, in turn, prepares a summary of these reports which the Secretary of Labor transmits to the President and Congress, informing them about working conditions of Federal employees in general and about improvements that individual agencies have made for their employees. In addition, agency reports are reviewed by OSHA onsite evaluators. Because of the diversity among agencies, data will not be used to compare agency performance. However, data will be combined to present a "picture" of safety and health in the Federal Government over time.

OSHA is the "trigger" agency for the Annual Report. Each year they issue the guidelines for preparing the report. Some years the guidelines are the same as the previous year. Some years the guidelines change. ARS never knows what the specific format will be from one year to another. In any event, some kind of annual report is always required.

SHEMB will be responsible for either distributing the OSHA format or developing a format for the Annual Report.

In accordance with USDA Regulation 4400 the submission due date for the ARS Annual Report to the Department is December 20 of each calendar year.

D ARS INSPECTION AND ABATEMENT PROGRAM

1 Purpose and Scope

This subsection establishes a system for making planned, periodic inspections at all ARS organizational levels to eliminate hazards which may result in employee injury, illnesses, property damage, and/or environmental releases. Inspections are required for all locations annually or in response to employee reports of unsafe or unhealthful working conditions.

2 References

a P.L. 91-956, "Occupational Safety and Health Act of 1970".

b Executive Order 12196, Occupational Safety and Health Programs for Federal Employees.

c 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs.

d 29 CFR 1910, "General Industry Occupational Safety and Health Standards".

e 29 CFR 1926, Safety and Health Regulations for Construction Standards.

f 29 CFR 1928, Safety and Health Standards for Agriculture.

3 Abbreviations

AAO - Area Administrative Officer

ASHM - Area Safety and Health Manager

CEPS - Cluster Environmental Protection Specialist

EO - Executive Order

EPA - Environmental Protection Agency

GSA - General Service Administration

OFM - Office of Finance and Management

OIG - Office of Inspector General

OSHA - Occupational Safety and Health Administration

PHC - Potentially Hazardous Conditions

SHMD - Safety and Health Management Division, OFM

SHEMB - Safety, Health, and Environmental Management Branch

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

4 Forms

ARS-162 - Notice of unsafe or healthful working conditions

ARS-404 - Inspection and Abatement Data Form

5 ARS Policy

Management officials and supervisory personnel in the Areas, Centers, and locations will assure prompt attention to reports, by employees or others, of unsafe or unhealthful working conditions; assure periodic inspections of workplaces by personnel with sufficient technical competence and equipment necessary to conduct thorough inspections of the workplace involved; and assure prompt abatement of unsafe or unhealthful working conditions, including those facilities, and/or equipment furnished by another Federal, State, or local agency. All inspections and abatement actions will be in compliance with 29 CFR 1960, Subpart D, Inspection and Abatement, and as appropriate, with the provisions outlined in the codes and regulations located in the reference section of this chapter.

6 Purpose of Inspections

Safety, health, and environmental inspections are of vital importance in accident control. They assist in determining what safeguards are necessary to eliminate or otherwise remove hazards before accidents, personal injuries/illnesses, and environmental exposures/releases before they occur. In addition, inspections enable the inspector to come in contact with individual workers and to enlist their help in eliminating accidents. The whole purpose of inspections should be one of helpfulness in discovering conditions which, upon correction, will result in making the facility a safe place to work; one where research operations can be conducted economically, efficiently, and safely.

Safety, health, and environmental inspections are conducted to:

o Detect and identify conditions which have caused or may cause accidents.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

o Detect unsafe acts such as operating equipment without authority, and/or at unsafe speeds, unsafe handling of materials, improper personal protective equipment, etc.

o Maintain personal contact with location personal.

o Check for compliance with all established standards pertaining to the location operations.

o Create and maintain interest in the Safety, Health, and Environmental Management Program.

o Aid in selling the program to employees and demonstrate managements' interest in the program and the employee's welfare.

7 Responsibilities

Center Directors/Location Coordinators and Research Leaders, in concert with the AAO, will provide for safety, health, and environmental inspections within their respective areas of responsibility to evaluate safety, health, and environmental program effectiveness.

Specifically:

a ARS locations will have a thorough inspection each year by "authorized inspectors" who are persons having:

(1) Knowledge of the work activities, the location, and the ARS Safety, Health, and Environmental Management Program Requirements.

(2) Training and/or experience in basic environmental monitoring, engineering, inspection, and application of safety, health, and environmental related standards pertinent to ARS operations.

NOTE: Form ARS-404 will be used to identify the minimum areas to be reviewed during the

inspection. The ARS Inspection and Abatement Data Form will be used and supplemented by narrative documentation as required.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

b High-hazard work areas (where potential exists for fatality or long-term health-hazard) will be inspected at least once each year (more frequently if required) by "qualified inspectors" who meet one of the following Office of Personnel Management Standards (depending on the hazard involved):

(1) Safety Manager/Specialist (GS-018)

(2) Safety Engineer (GS-803)

(3) Fire Protection Engineer (GS-804)

(4) Industrial Hygienist (GS-690)

(5) Physicist (GS-1306)

(6) Aviation Safety Specialist (GS-1825)

(7) Safety Technician (GS-019)

(8) Environmental Protection Specialist (GM-028)

c Appropriate and timely followup reviews will be made of inspection reports. Priority will be given to abatement of hazards noted during inspections (within a reasonable timeframe as assigned by the inspector in concert with location officials in charge).

d Inspection records will be maintained for a minimum of 5 years following the end of the year in which the onsite inspection was completed.

e Information will be distributed throughout their respective areas of responsibility and to the SHEMB on inspections or accident investigations that identify hazards which may have application at other ARS locations.

8 Center Directors/Location Coordinators, Research Leaders

With the assistance of the AAO or ASHM, they will develop a Safety, Health, and Environmental Program plan to be submitted to SHEMB by November 30 of each year. This plan should be updated each year to

document changes in projected inspections and to identify:

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

a All high-hazard facilities.

b Specific facilities to be inspected by:

(1) AAO or ASHM or "Qualified Inspectors."

(2) "Authorized Inspectors."

(3) Private Contractors.

c Persons designated as collateral duty safety and health representatives and safety committee members at each location.

9 Frequency of Inspections

a AAO's and ASHM's will inspect, or ensure the inspection, by competent qualified safety, health, and environmental inspectors of:

(1) All high-hazard facilities at least once every year (unless more frequent inspections are required).

(2) All locations at least once every 5 years (unless the location has limited risks reflected by low injury and illness frequency and severity rates, in which case inspections will at least be conducted once every 7 years by "authorized inspectors").

(3) Locations in response to employee reports alleging unsafe or unhealthful working conditions.

(4) Any location at which an inspection is essential to maintain the safety and health of personnel and/or the integrity of the environment.

b <u>Authorized Inspectors</u> will inspect at least annually and when directed by the official in charge of the location.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

10 Authority of Inspectors

ARS inspectors are authorized to enter without delay

and at any reasonable time any building, installation, facility, construction site, Area, workplace, or other environment where work is performed by ARS employees to:

a Inspect and investigate, during regular work hours and at other reasonable times, any place of employment and all pertinent conditions, structures, machines, apparatuses, research processes, devices, equipment, and materials.

b Question privately any employee, supervisor, or official in charge of a location.

c Inspect areas containing information classified in the interest of national security, if they have appropriate security clearance(s).

NOTE: Only persons with security clearance can accompany the inspector into that area.

d Deny accompaniment to any person whose participation interferes with a fair and orderly inspection.

e Take environmental samples; take or obtain photographs related to the purpose of the inspection; and use other techniques to accomplish the objectives of the inspection.

11 Activities of Inspectors

ARS Inspectors will:

a Be in charge of all aspects of the inspection.

b Discuss the objectives of the inspection with the official in charge upon arrival at the location.

c Examine the location's accident and illness records to help identify potential safety, health, and environmental hazards before beginning the inspection.

d Be accompanied during the inspection by the official in charge or the official's representative.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

e Consult with employees and/or employee representatives on safety, health, and environmental matters as required and permit accompaniment when necessary to conduct an effective inspection.

f Provide employees the opportunity to bring unsafe and unhealthful conditions, which they believe exist, to their attention during the inspection.

g Comply with local safety, health, and environmental rules and practices.

h Wear necessary personal protective equipment during the inspection.

i Make every effort to avoid unreasonable disruption of the operations being inspected.

j Hold a closing conference with the official in charge at the conclusion of each onsite inspection to:

(1) Informally advise them of unsafe or unhealthful working conditions found during the inspection.

(2) Permit them to provide pertinent information regarding conditions in the workplace bearing upon the inspection.

k Weigh all information presented before writing the final inspection report.

NOTE: Additional representatives (management and/or employee) may be allowed to accompany and aid the inspector if the inspector determines that additional participation is needed.

12 Personnel Involved

Personnel usually employed in the Safety, Health, and Environmental Inspection include:

a Representatives from Location Administrative Office (e.g., property, engineering, maintenance, etc.).

b Building unit, institute, program representatives.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

c Collateral Duty Safety Officers.

d Safety Committee Members.

e Outside Consultants (fire protection, Industrial Hygienist, Environmental Protection Specialist, State or local government personnel).

f ASHM.

g Department level personnel.

h SHEMB members.

i Government representatives when their function is involved (e.g., DOL, DOT, EPA, OSHA).

j Union or bargaining representatives.

k University/other Federal agency landlords/tenants.

l CEPS.

13 Imminent Danger Situations

a <u>ARS Inspectors and Supervisors</u> will immediately notify the official in charge upon making a determination that conditions exist which constitute an imminent danger to the safety and health of the employees and/or to the environment.

b <u>Officials in Charge</u> will:

(1) Immediately, upon notice of an imminent danger situation, notify and withdraw all employees not needed to eliminate the hazard.

(2) Consult with the AAO or ASHM and SHEMB for advice on proper hazard abatement action.

14 Employee Reports of Unsafe or Unhealthful Working Conditions

a Stated are procedures for employee use in reporting alleged unsafe or unhealthful working conditions and requesting inspections of such conditions. These procedures:

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

(1) Supplement, but do not substitute for, oral reports to supervisors who, in most cases, are able to eliminate problems as soon as they are identified.

(2) Provide for prompt management review and response to employee reports in accordance with EO 12196 and 29 CFR 1960.

NOTE: Nothing in this Chapter is intended to interfere with the simultaneous, or subsequent use of ARS or negotiated grievance procedures by employees to request correction of alleged unsafe or unhealthful working conditions. However, employees are not required to await the formal outcome of a grievance before filing a written report under provision of this section.

b Report Procedures (Employee Action)

Step 1. Notify the AAO or ASHM's in writing. Give reasons for the report and describe the specific condition(s). Include the location of the hazard within the workplace and facility location.

Step 2. If no action from Step 1, notify the SHEMB in writing. The report to SHEMB must:

(1) State the grounds for the report as specifically as possible.

(2) Identify the location of the alleged unsafe or unhealthful working conditions.

(3) Be signed by employee.

(4) If so desired, request that the name of the employee making the report, or names of employees, referred to in the report, not be disclosed.

Step 3. If no action from Step 2, send report of the alleged unsafe or unhealthful condition(s) to SHMD, OFM, USDA. Include grounds for the report as indicated in Step 2.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

Step 4. If dissatisfied with action from Step 3, send a written report of the alleged condition(s) to the U.S. Department of Labor, OSHA, Office of Federal Agency Programs, Washington D.C. 20211. Describe in detail the entire processing of the report and specify objections to actions taken, or not taken.

c Management Action

AAO or ASHM will:

(1) Review employee reports of alleged unsafe and unhealthful conditions.

(2) Within 5 workdays after receipt, determine if there are reasonable grounds to believe the alleged conditions exist.

(a) If reasonable grounds for inspection do_not_ exist, notify the employee in writing of:

1) The determination not to make an inspection.

2) Their right to:

a) Request a prompt and informal review.

b) Contact the U.S. Department of Labor, OSHA, Office of Federal Agency Programs, Washington, D.C. 20211.

(b) If reasonable grounds for inspection exist, but an inspection reveals no unsafe or unhealthful conditions, notify the employee in writing of:

1) Results of the inspection.

NOTE: (1) At the time of inspection, if the inspector cannot find the alleged condition without assistance from the person who submitted the report, the employee's name may

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

be disclosed after ensuring that the inspector will not disclose the employee's name or the name of the employees referred to in the report; (2) Inspections, resulting from a report of alleged conditions, need not be limited to conditions reported.

(c) If reasonable grounds for inspection exist and reveal unsafe and unhealthful working conditions, notify the employee of:

1) The results of the investigation.

2) Corrective action to be taken.

(3) Document determinations and reasons for final dispostion of employee requests for inspections of

alleged unsafe or unhealthful working conditions.

15 Notices of Unsafe or Unhealthful Conditions

The following procedures are established for issuing notices of unsafe or unhealthful working conditions (Form ARS-162) found during inspections required by this Chapter.

a AAO's, ASHM's, and "Authorized Inspectors" will prepare original and three copies of Form ARS-162 and will:

(1) Describe, in detail, the nature of the condition. Include:

(a) A reference to the applicable OSHA, EPA, State, ARS, etc., standard in violation.

(b) A reasonable time limit for correcting the condition.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

NOTE: 30 calendar days from the date of receipt of the notice shall be considered reasonable in most instances.

(2) Distribute notices (Form ARS-162) as follows:

Original - To the Official in charge.

One Copy - To the next level of supervision

One Copy - To the Location Safety Committee or Representative

One Copy - To employee (if a result of an employee alleged condition).

b Officials in Charge will:

(1) Upon receipt of notice (Form ARS-162), immediately post the unedited notice, or a copy:

(a) If practical, at or near each place the condition referred to in the notice exists or existed.

(b) If not practical due to the nature of the establishment, in a prominent place where all affected employees can readily see it.

(c) If employees do not primarily report to work at a single location, at a location where they meet to carry out their activities.

(d) Notices are to remain posted at least 3 workdays or until the hazardous condition is corrected.

NOTE: Necessary steps must be taken to assure notices are not altered, defaced, or covered by other materials.

16 Correction of Unsafe and Unhealthful Working Conditions

a Officials in charge will:

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

(1) Be primarily responsible for correcting unsafe or unhealthful conditions. When a notice is issued by the AAO or ASHM or "authorized inspector," abatement will be carried out within the time stated.

(2) In cooperation with the location collateral duty safety and health representative or safety and health committee member, submit an abatement plan to the AAO or ASHM. If abatement cannot be carried out within 30 calendar days from receipt of a notice of unsafe or unhealthful conditions, the plan shall be submitted to the SHEMB.

Abatement Plans will include:

(a) An explanation of the circumstances which delay abatement.

(b) Steps taken in the interim to protect employees.

(3) When a hazard cannot be abated without the assistance of the GSA or other Federal lessor agencies, the occupant of the ARS location will act with the lessor agency to secure abatement. Procedures for coordination with the GSA are contained in 41 CFR 101-20.

(4) Submit a revised abatement plan if changes are made in the original abatement plan.

b <u>AAO's and ASHM's will</u>:

(1) Conduct followup inspections or designate "authorized inspectors" to monitor compliance with recommended corrective actions.

(2) If upon reinspection, acceptable abatement has not been carried out according to the location's abatement plan, inform the next higher level of supervision giving recommendations for corrective action.

(3) Notify SHEMB if the estimated time for abatement exceeds 60 calendar days.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

17 Inspections by OSHA

The Secretary of Labor or designee are authorized to conduct, when the Secretary deems it necessary, announced or unannounced inspections of ARS locations. When OSHA enters an ARS facility, it is the responsibility of the location officials to contact the Area immediately. The purpose of the meeting, the names and badge numbers of the inspectors/evaluators and other pertinent information must be provided to the Area Office. The Area has the responsibility to contact SHEMB and/or the Director of SHEMB immediately. SHEMB will notify the Department.

The Secretary's inspectors or evaluators are authorized to enter without delay, and at reasonable times, any building, installation facility, construction site, or other area, workplace, or environment where work is performed by employees of ARS. All OSHA inspections will be in compliance with the provisions set forth in 29 CFR 1960.31.

18 Non-ARS Controlled Space

a ARS is not relieved of responsibility for conducting a Safety, Health, and Environmental Inspection because operations are conducted in space leased from GSA, other Federal, or nonfederal agencies.

b Contracts for leasing space must provide that such space meets all applicable OSHA, EPA, ARS, and other Federal, State, and local standards. Also, the lessor should be obligated to correct all violations of

such standards in a timely manner.

19 Conducting the Inspection

Recommended steps for conducting the inspection:

a Designation of individual(s) or team(s).

b Selection of appropriate inspection form to be used. ARS uses the Inspection and Abatement Data Form supplemented with narrative materials outlined in section 20 of this subsection.

c Training personnel for form use and other activities.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

d Scheduling times for inspection activities.

e Conducting inspection step.

f Interpreting results and writing reports.

g Followup by using information gained.

20 Report Preparation

a Examples of elements which are pertinent for inclusion (narrative information) include:

(1) The purpose of the inspection.

(2) The portion of the workplace that was inspected.

http://imagepc/fd/shemb_tools/manual230_93ver/A_Evaluation Component.htm

a Files of employee reports of alleged unsafe or unhealthful working conditions must be retained for 5 years following the end of the calendar year in which reported. These files may be kept at the location involved or other locations as determined by AAO or ASHM (i.e., Federal Archives and Records Centers).

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

b The OSHA/EPA/OIG may request copies of ARS inspection reports relating to employee reports of unsafe or unhealthful conditions, and may conduct unannounced inspections of such conditions (by OSHA) if necessary. Requests for inspection reports shall be through the AAO or ASHM. SHEMB shall be notified immediately when requests are received.

22 Identifiable Areas of the Workplace to Inspect

For additional information concerning any or all of these identifiable areas of the workplace, contact the ASHM.

a Buildings and related services.

(1) Construction, floors, equipment layout, and color coding.

(2) Equipment and supplies for housekeeping and maintenance of facilities and land.

(3) Building services: heating, lighting, sanitation, ventilation systems.

b Machinery and Mechanical Equipment.

(1) Hand and power operated machines and tools.

(2) Conveyor, hoisting, and non-highway transport.

c Respiratory and skin destructors.

(1) Aerosols, dusts, vapors, mists, and participulate pollutants.

(2) Adhesive, chemical, gastric, petroleum, and plastic substances.

(3) Bio Hazards.

d Protective equipment and devices.

(1) Design features and functions of personal protective equipment.

(2) Guards and shields for machines and isolated areas.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

e Warehousing and Fire Protection.

(1) Facilities and equipment for materials handling and storage.

(2) Devices and materials for fire prevention and control.

f Radioactive materials and radiation-emenating equipment.

23 Potentially Hazardous Conditions Associated with the Identifiable Areas of the Workplace Listed in Section 22.

The separate PHC have been listed under six major categories.

a Look for guarding of agents, such as:

(1) Missing or inadequate guards against being "struck by."

(2) Missing or inadequate guards against "striking against."

(3) Missing or inadequate guards against being "caught on, in, or between."

(4) Missing or inadequate guards against "falling from or onto."

(5) Lack of or faulty support, bracing, shoring, etc.

(6) Missing or faulty warning or signal device.

(7) Missing or faulty automatic control device.

(8) Missing or faulty safety device.

b Look for structural defects and material characteristics, such as:

(1) Sharp edged, jagged, splintery, etc., conditions.

(2) Worn, frayed, cracked, broken, etc., conditions.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

(3) Slippery conditions (for gripping of walking).

(4) Dull, irregular, mutilated, etc., conditions.

(5) Uneven, rough, picked, or with holes.

(6) Decomposed or contaminated conditions.

(7) Flammable or explosive characteristics.

(8) Poisonous characteristics (by swallowing, breathing, or contacting).

(9) Corroded or eroded conditions.

c Look for functional defects, such as:

(1) Subceptibility to breakage, collapse, etc.

(2) Susceptibility to tripping, falling, etc.

(3) Susceptibility to rolling, sliding, slipping, etc.

(4) Leakage of gases, fumes, or fluids.

(5) Excessive heat, noise, vibration, fumes, sparking, etc.

(6) Failure of ageny to operate.

(7) Erratic, unpredictable performance of agent.

(8) Lack of adequate electrical grounding.

(9) Operation that is too fast or too slow.

(10) Low voltage leaks.

(11) Signs of excessive high or low pressure.

(12) Throwing off of parts, particles, materials, etc.

(13) Standard indications of need for special attention.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

d Look for ventilation, illumination, noise, and forces of nature such as:

(1) Noxious fumes or gases.

(2) Flammable or explosive fumes or gases.

(3) Insufficient illumination.

(4) Excessive glare from light source.

(5) Hazardous dusts or atmospheric particles.

(6) Hazardous temperature conditions.

(7) Excessive noise.

(8) Snow and Ice.

(9) Hurricanes.

(10) Tornadoes.

(11) Floods.

(12) Electrical storms.

(13) Earthquakes.

(14) Rain.

(15) Landslides.

e Look for storage, positioning, and arrangement of agents, such as:

(1) Improperly secured against sudden movements, such as, falling, slipping, rolling, tripping, slides, etc.

(2) Unsafe storage that permits easy contact by people or equipment.

(3) Unsafe exposure to heat, moisture, vibrations, flame, sparks, chemical action, electric current, etc.

(4) Congestion of traffic or working space.

(5) Unsafe attachment of objects to agents.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

(6) Unsafe distribution of objects around agent.

(7) Protruding objects.

(8) Use of unsafe storage containers.

(9) Faulty ventilation of stored materials.

(10) Unsafe traffic layout.

(11) Poor housekeeping.

f Look for human factors (psychological, behavioral), such as:

(1) Bad attitudes.

(2) Emotional instability, including difficulty in tolerating tension and frustration.

(3) Unmet emotional needs.

(4) Constant worries.

(5) Not adequately trained for the task.

(6) Personality conflicts with supervisory and co-workers.

(7) Lack of work (TASK) skills.

(8) Lack of communication skills.

(9) Slow reaction time.

(10) Fast reaction time.

(11) Poor perception.

(12) Lack of concentration skills.

(13) Risk taker.

24 Methods of Control

a Recommended methods for controlling PHC are listed below.

D ARS INSPECTION AND ABATEMENT PROGRAM (Continued)

(1) Engineering Controls - Reduce or eliminate the problem at its source. Examples of engineering controls are: substitution, process change, equipment replacement, isolation barriers, isolation distance, ventilation (local), ventilation (general), equipment modification, and continuous environmental monitoring.

(2) Administrative Controls - Modify work schedules to reduce or eliminate employees exposure. Perform hazardous activities during off hours, employee rotation to reduce exposure time, temporarily remove employees from area and establish work/rest cycles, are a few examples.

(3) Work Practice Controls - Modify employee work habits to reduce or eliminate exposure to control

employee work practices. Management should control the personal hygiene of each employee, educate and train them correctly, and monitor their work area (housekeeping).

(4) <u>Personal Protective Equipment</u> - Protect the employee from the work area or tasks. This can be implemented by issuing respirators, gloves, clothing, skin creams, and footwear.

E JOB HAZARD ANALYSIS

The first step in controlling hazards is to identify them. One of the ways to do this is to perform a Job Safety Analysis (JSA) on a specific operation or task. As we perform the job safety analysis, we can identify and evaluate each potential hazard and accident that may be encountered while performing the task or operation.

Once identified, each potential hazard to be encountered can be controlled, or managed, thus eliminating or reducing the chances of an accident and resultant injury. Methods of controlling, or managing, the risk from the identified hazards include engineering out the hazard, changing the task or operation to eliminate the hazard, and educating personnel about the hazard if it can't be removed or changed. JSAs are an important tool that can be used when investigating accidents, changing an operation/task, adding a new operation/task, evaluating an operation/task, or designing an operation/task. Supervisory personnel especially need to

E JOB HAZARD ANALYSIS (Continued)

know about the techniques of conducting JSA's because of their involvement in the operations/tasks in their area of expertise. ARS supervisors and employees cover a broad spectrum of activities including laboratory research, operation of complex farm machinery in the field, biological experiments, and other varied activities. They are exposed to a myriad of hazards and potential accidents on a daily basis. JSA's are the only effective method of identifying and controlling these hazards and eliminating the potential accidents.

1 Performing a Job Safety Analysis

The actual performance of a JSA is easier than it sounds. There are four (4) basic steps to a JSA. They are:

a Select the operation/task.

b Break the job down into a sequence of steps.

c Identify hazards and potential accidents.

d Develop solutions to eliminate or reduce level of hazard.

Each of the steps will be discussed in more detail. The National Safety Council has a formal Job Safety Analysis form which may be procured and used. Detailed information on JSA's is also available in the current edition of the National Safety Council's "Accident Prevention Manual for Industrial Operations."

2 Select the Operation/Task

Select the operation/task on which the JSA is to be performed. A complex operation may need to be subdivided into a series of operations/tasks with a JSA on each subdivided operation/task. This

technique can make a seemingly insurmountable job of performing a JSA on an extremely complex operation/

task go easily. The operation/task subdivisions take less time and can be done one part at a time. All the subdivisions put together total a whole JSA on the whole operation/task.

E JOB HAZARD ANALYSIS (Continued)

3 Break Down the Operation/Task

The operation/task should be broken down into a sequence of logical steps needed to accomplish the operation/task. It is easy to become too detailed, or too general, in the breakdown. Experienced personnel use an employee to perform the operation/

task and the person performing the JSA will write down the steps as the employee accomplishes them. Two (2) people also seem to make it easier to perform a realistic task breakdown. Make sure that each step is listed. A step may require activity, such as moving an item, turning on a machine etc., or it may only require inspecting a switch setting, or checking a measurement. The step is a part of the overall, whole operation/task.

4 Identify Hazards and Potential Accidents

Identify the hazards and potential accidents involved with each step of the operation/task breakdown. Many JSA's fall short at this point because only the obvious hazards are identified. For a JSA to be effective, each step must be studied carefully not just for the obvious physical hazards, but also conditions pertaining to the work environment, and any substances used or involved. Examples might include lack of ventilation, inadequate design of a workstation, chemicals or flammable liquids in use, etc. A hazard may be existing, or it may be potential, not existing normally, but present under certain conditions. As the hazards and potential hazards are identified, then the potential accidents which may result can be identified and listed. Keep in mind the object is to identify the hazard and its associated potential accident, then by eliminating or reducing the hazard

in turn eliminate or reduce the potential for an accident.

5 Develop Solutions

The last step in the JSA is to develop solutions which will eliminate or reduce the level of the identified hazard and, in turn, the associated potential accident. Some of the solutions which may be used include:

a Change the physical conditions that created the hazard; i.e., facility layout.

E JOB HAZARD ANALYSIS (Continued)

b Change the work procedure by doing it a different way or by using a different tool or piece of equipment.

c Engineering out the hazard; i.e., a new ventilation system, a new workstation.

d If other solutions are not practical, is additional training or emphasis on the hazard (education) a viable option for reducing the level of hazard and potential for accident? This approach should not be considered until all other alternatives have been exhausted. If for some reason the training is not given, or the education is forgotten, then the hazard rises back to the original level of hazard and potential for

accident as when identified, and nothing has been accomplished. All too many times, solutions do not sufficiently or directly address the identified hazard and as a result the hazard and associated accident potential are not eliminated or significantly reduced. The presence of a hazard does not mean that an accident will occur, only that one of the factors is present. Other factors such as an unsafe work practice, or a distracted worker, often combine, then the accident occurs. By removing or reducing the level of hazard, we may be able to prevent the accident from occurring at all.

6 Tie-In

A properly accomplished JSA can be an effective tool in the hands of a motivated supervisor since it can be used for the following:

a Investigating accidents and determining cause factors.

b Conducting safety self-inspections of the work area to identify and correct hazardous conditions.

c Determining training needs for employees who perform the operation/task on which the JSA was performed.

d Assists the supervisor in determining requirements for protective equipment for employees, and in some cases, the need for equipment to perform the operation/task.

E JOB HAZARD ANALYSIS (Continued)

e Provides the supervisor and employee with a better understanding of the operation/task.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS

1 Background and Summary of the Onsite Assistance Review (OAR) Program

Consistent with Federal law and Executive policy, ARS managers are responsible for providing a safe and healthful workplace protective of human, economic, and environmental resources. Like most organizations, ARS uses comprehensive safety, health, and environmental management (SHEM) programs to minimize worker illness and injury, losses in productivity, Workers Compensation claims, environmental effects, civil and criminal penalties, and liability exposure.

Recognizing that it is not easy for ARS managers to identify, interpret, implement, and track changes in the complex Federal, State, and local requirements applicable to ARS facilities, ARS issues guidance on basic requirements for SHEM programs and employs safety managers, industrial hygienists, and environmental specialists to render technical support. The Agency also established the OAR program to periodically review implementation, management, operation, and evaluation of the SHEM program at both the Area and location levels. A critical component of these reviews is examination of the efficiency and effectiveness of operational and administrative activities, specifically management,

education/training, services, oversight, and evaluation.

Like the Consolidated Assistance Review and Evaluation (CARE) program, the Onsite Assistance Reviews program's main objective is assisting management officials in their efforts to manage their facilities, programs, and operations so that they meet applicable requirements and improve their operations in the true participative spirit of Total Quality Management. Through OAR's, Area and location personnel become aware of their program strengths and weaknesses and, in a spirit of cooperation, are stimulated to take corrective action, while protecting themselves and the Agency from adverse actions and legal claims. Thus, in-place personnel, with outside assistance, can

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

work to improve the quality, efficiency, and delivery of their own programs.

2 Program Objectives

The objectives of the OAR are to:

o Identify the effective/functional level of ARS SHEM program components and procedures within the

management structure of the organizational level being reviewed.

o Identify improvements and replacements for program components and procedures deemed unnecessary, outdated, or inefficient.

3 The OAR Process

The managerial/adminstrative component of the OAR centers on management/policy, education/training, services, oversight, and evaluation aspects of the SHEM function, using checklists to determine whether the management structures are in place to deliver a good program. Then, from year to year, supplementary checklists focus on program areas and activities deemed to expose the Agency, its managers, and its employees to unacceptable risk, adverse action or publicity, or liability. Focus areas are selected based on regulatory agency priorities, public perceptions of risk, and information gathered through various reporting mechanisms, such as the Office of Management and Budget's A-106 report, Resource Conservation and Recovery Act Section 3016 inventory, Inspection and Abatement Program reports, industrial hygiene baseline surveys, and the Occupational Health Maintenance Program quarterly and annual reports.

The OAR process will eventually reach all parts of ARS. Reviews are scheduled for Area Offices and a number of locations. Each review is performed by individuals selected from the Safety, Health, and Environmental Management Branch (SHEMB), the Areas, and the locations. Preparations for OAR's are similar to those for inspections, discussed earlier in this chapter. The OAR panels draft reports of findings and recommendations and submit them to the Deputy Administrator for Administrative Management, through the Director, Facilities Division (FD), within 6 weeks of the onsite review. Subsequently, a final report is sent to the Area Administrative

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

Officer (AAO). If the report is for a specific location, the AAO handles formal distribution of the report.

The OAR program seeks to discover, through concerted efforts among Headquarters, the Area, and the location, the strengths and weaknesses of existing SHEM program activities. Where weaknesses exist, additional resources or remedial measures are recommended or validated. OAR reports are normally distributed widely.

The OAR program serves as an educational tool for annual program evaluations required by CFR Part 1960, Basic Safety and Health Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters, and it extends these evaluations into environmental management areas. Participation in the OAR program helps ready location and Area personnel for periodic self-reviews to determine the effectiveness of their own programs. It serves as a guide for identifying specific program improvement projects, producing a perception of "what's going on" within the Agency, and guiding the selection of inspections and audits by Areas and SHEMB.

Implementation of the OAR program provides a database for quantifying management policies and operational features at field locations.

The OAR program also simplifies preparation of the USDA Annual Report to the Occupational Safety and Health Administration, and it should reduce paperwork, administrative processes, and information inquiries.

Onsite reviews, with subsequent corrective action, should assure that ARS, the Areas, and the locations have identified and addressed administrative and clerical problems that could be cited during inspections by Federal or State regulatory agencies.

In summary, most everyone agrees they have a responsibility to comply with the law, but many find it difficult to do so when the requirements are complex and resources are scarce. The OAR's will help us to understand our legal responsibilities, and it will also help us appreciate the benefits of going beyond the minimum requirements of the law;

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

i.e., into the development and implementation of a comprehensive program.

4 Authorities

The Occupational Safety and Health Act of 1970 (Act) essentially requires ARS to provide employment free from recognized safety and health hazards that could result in injury, illness, or death. The Act, through 29 Code of Federal Regulations, Part 1960 (29 CFR 1960), also requires Federal agencies to conduct program reviews like the OAR in order to effectively manage their programs.

Administration of the Act falls under several agencies:

o OSHA (Occupational Safety and Health Administration), in the U.S. Department of Labor (DOL), establishes and enforces occupational safety and health standards through inspections, citations, and fines.

o NIOSH (National Institute for Occupational Safety and Health), in the U.S. Department of Health and Human Services, recommends safety and health standards and conducts research, investigations, demonstrations, and programs of education and training relating to occupational safety and health.

o OSHRC (Occupational Safety and Health Review Commission), an independent Government body, holds hearings on appeals from DOL or the employer and renders decisions which may be appealed.

o State OSHA Program (State Occupational Safety and Health Administration Program). Some States have chosen to assume responsibility for administration of the Act. Under special plans negotiated with DOL, States agree to establish programs of inspection, citation, and training that meet or exceed the minimum standards promulgated under the Act.

Executive Order 12088, Federal Compliance with Pollution Control Standards, requires Executive agencies to comply with substantive, procedural, and other "pollution control standards" applicable to the private sector. In addition, several Federal statutes include limited or complete waivers of sovereign immunity with regard to compliance.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

Executive policy and waivers of sovereign immunity were strengthened by the Federal Facilities Compliance Act of 1992. Also, the Environmental Protection Agency (EPA) has published documents entitled "EPA Policy on Environmental Auditing" and "Federal Facilities Compliance Strategy," both of which encourage Federal agencies to conduct environmental audits. Finally, audits, inspections, or these OAR's are essential to meeting Departmental policies on environmental pollution prevention, control, and abatement.

5 Roles and Responsibilities

a The Director, Facilities Division, will provide leadership in coordinating the OAR program. The Chief, Safety, Health, and Environmental Management Branch (SHEMB) will serve as the OAR Program Coordinator.

b The Director, FD, and the OAR Coordinator will interact with the National Program Staff, Administrative Management Divisions, Area Directors (AD), Area Administrative Officers (AAO), Area Safety and Health Managers (ASHM), Center Directors, Research Leaders, location Coordinators through meetings, teleconferences, reports, and requests.

c OAR members will be obtained from SHEMB, the ASHM's, and the location Collateral Duty Safety Officers or Safety Committee. These individuals represent those people with adequate experience, background, and familiarity with the organization's functions to enable an accurate

review of the locations' program components and implementation activities. The Chief of SHEMB or his designee will serve as the Team Leader on all OAR's.

d Specific duties and responsibilities include:

Member   Responsibility

Director, FD o Provides leadership in coordinating the OAR program.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

o Provides resources in the form of a Program Coordinator and clerical support.

o Provides financial resources necessary to complete the onsite reviews.

OAR Coordinator o Establishes an OAR program management plan and schedule.

o Evaluates and recommends OAR members.

o Coordinates and interacts with Area/location managers, AAO's, and AD's.

o Reports accomplishments/

findings to the Deputy Administrator for Administrative Management (DAAM), AD's, and AAO's through FD.

o Serves as the representative of the OAR program at conferences and meetings.

o Provides leadership to review team members.

o Leads entry and exit review briefings.

o Consolidates review findings and reports accomplishments/findings to the Director, FD.

Review Members o Actively participates in overall OAR meetings.

o Provides "how to" advice, assistance, and on-the-job training to those reviewed.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

o Recommends changes to processes, policies, procedures, or guidelines that will improve the quality of the program.

o Recognizes and documents quality program implementation activities being provided by those being reviewed.

o Drafts appropriate sections of the report of findings/recommendations.

6 Program Components Being Reviewed

Some Safety, Health, and Environmental Management Program components which will be reviewed during the review process include:

o Employee Assistance Program

o Occupational Health Maintenance Program

o Hazardous Waste Disposal Program

o Asbestos Abatement Program

o Safety and Health Education/Training Program

o Industrial Hygiene Program

o Safety and Health Equipment Procurement Program

o ARMP and its relationship to the Program

o Safety/Health Structure within the location

o Reparative Maintenance and Salvage Operations

o Safety/Health Information Distribution Program

o Safety/Health Orientation Program

o Safety/Health Incentives/Awards Program

o The Facility Safety Protection Plan

o The Safety/Health Committee

o Design/Construct Review Process

o The Inspection/Abatement Program

o The Housekeeping Program

o Hazardous Materials Handling/Storage Program

o The Accident Reporting Program

o The Office of Workers Compensation Program

o The Community Right-to-Know Program

o The Chemical Hygiene Program

o The Accident/Incident Statistical Program

o The Annual Evaluation Program

o The Hazardous Waste Management Program

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

7 Program Review Criteria

The OAR program is designed to gather baseline data at ARS facilities. The baseline data will be used to assess each location's Safety, Health, and Environmental Management Program.

The review criteria is divided into five major Safety, Health, and Environmental Management Program components. They are:

a Safety, Health, and Environmental Management

b Safety, Health, and Environmental Education/

Training

c Safety, Health, and Environmental Services

d Safety, Health, and Environmental Oversight

e Safety, Health, and Environmental Evaluation

A series of standard safety, health, and environmental related questions which are being reviewed are listed below each program component. Reference Exhibit 1 for the review criteria and verification statements. These questions will be considered when conducting the OAR.

Listed under each question are a series of statements which are to be used by the reviewer to "verify" the degree of compliance with the question being asked.

To adequately complete the review process, the reviewer must become familiar with the program components, the questions, and the verification statements. Secondly, the reviewer must carefully

ask the required question and examine the actual activity with the verification statement. If the actual activity compares with the verification statement, the activity doesn't require additional attention from management. If the actual activity does not compare with the verification statement, the activity is highlighted and included along with corrective actions within the review report. If the activity is not applicable, it will be listed as such in the report.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

8 Focus Programs

As described above, the managerial/adminstrative component of the OAR focuses on the management/

policy, education/training, services, oversight, and evaluation aspects of the SHEM function. Its orientation is more towards structure and process than technical issues. The checklist is clearly geared to determining whether the management structures and resource commitments are in place to deliver a good program.

Focus areas are selected based on regulatory agency priorities, public perceptions of risk, and information gathered through various reporting mechanisms, such as the Office of Management and Budget's A-106 report, Resource Conservation and Recovery Act Section 3016 inventory, Inspection and Abatement Program reports, industrial hygiene baseline surveys, and the Occupational Health Maintenance Program quarterly and annual reports. They are more concerned with the details to ensure the Agency, its managers, and its employees are not

exposed to unacceptable risk, adverse action or publicity, or liability.

The 1993 focus programs are:

- Hazard Communication, Title 29, Code of Federal Regulation, Part 1910.1200 (29 CFR 1910.1200)

- Chemical Hygiene (29 CFR 1450)

- Community Right-to-Know (40 CFR 355, 40 CFR 370, and 40 CFR 372)

- Generator Standards for Hazardous Waste Management (40 CFR 262) and Compliance with State programs

The 1991 Office of Inspector General audits of USDA laboratories identified several deficiencies within ARS in the first three of the focus programs. A 1992 survey of ARS Areas showed that deficiencies remain in these programs. These deficiencies expose ARS, as well as its managers and personnel, to uncontrolled risks, losses, and liability. In this context, an Agency priority is to address these deficiencies and minimize risk exposure.

The fourth focus area was added to ensure that hazardous waste is being properly identified, managed, and treated or disposed Agencywide.

F ARS SAFETY, HEALTH, AND ENVIRONMENTAL MANAGEMENT PROGRAM ONSITE ASSISTANCE REVIEWS (Continued)

The checklist in Exhibit 2 contains the topics to be considered in evaluating the focus programs.

G EXHIBITS

1 Basic Safety, Health, and Environmental (SH&E) Program Component Review Criteria and Verification Statements

2 Safety, Health, and Environmental Management Focus Program Review Criteria and Verification

Statements

Exhibit 1

Part I

Basic Safety, Health, and Environmental (SH&E) Program Component Review Criteria and Verification Statements

(Revised April 1993)

Component A - Activity: Safety, Health, and Environmental Management

Question No. 1: Does a written plan for safety, health, and environmental management (SHEM) exist?

To verify, look for:

(a) annual goals/objectives published by the Area/location;

(b) "State of Location" entry in ARMP;

(c) safety/health/environment related performance standards for senior management officials; and

(d) DIRECTIVE and MANUAL 230.0, Safety, Health, and Environmental Management Manual.

Question No. 2: Has an individual been delegated authority and assigned specific responsibility for the program?

To verify, look for:

(a) charge letter to the individual,

(b) critical elements in performance standards, and

(c) a response from the individual.

Question No. 3: Is funding requested and available for SH&E program operations and activities?

To verify, look for:

(a) memos requesting funds for SH&E needs;

(b) amounts listed in ARMP documents;

(c) official requests (i.e., A-106, HPRL, ARMP, etc.) to Areas/Headquarters for additional funding; and

(d) tracking programs when Departmental hazardous waste funding is used.

Exhibit 1 (Continued)

Question No. 4: Are safety, health, and environmental rules, codes, and regulations present or available?

To verify, look for:

(a) 29 CFR 1910, 1926, 1928, 1960 standards;

(b) Current EPA and/or State regulations for:

the Resource Conservation and Recovery Act (RCRA), if hazardous wastes are generated;

the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), if quantities of petroleum products or hazardous substances, or circumstances of releases, would require reporting;

Clean Air Act; Clean Water Act; Federal Insecticide, Fungicide, and Rodenticide Act, others as appropriate;

(c) all ARS/Department Directives and Manuals; and

(d) accessibility of all documents to employees.

Question No. 5: Is safety/health considered in procurement practices and repair, storage, and salvage operations?

To verify, look for:

(a) evidence that the Collateral Duty Safety Officer (CDSO) or the Area Safety and Health Manager has reviewed 700's for hazardous substances, hazardous waste disposal, etc.;

(b) "manifest" documents for disposal of hazardous wastes;

(c) proper storage of chemicals/supplies; and

(d) isolation guarding and shielding principles.

Question No. 6: Are safety, health, and environment related documentation, record keeping, and reporting activities being performed?

To verify, look for:

inspection/abatement reports,

RCRA 3016 inventories,

hazardous waste disposal manifests,

CERCLA 103 documents,

OMB A-106 documents,

ARMP submittals,

reports of unsafe/unhealthful working conditions,

Exhibit 1 (Continued)

records of occupational injuries and illnesses,

hazardous waste determination procedures and records, and

monthly hazardous waste generation and inspection records.

Question No. 7: Are safety, health, and environmental permits and approvals being obtained and maintained?

To verify, look for: actual permits and compliance records for:

underground storage tanks,

landfills,

incinerators,

wastewater treatment or disposal systems,

water supply wells,

chemical disposal,

asbestos removal,

operating permits (Clean Air Act),

open burning, and

stormwater/wastewater discharge.

Component B - Safety, Health, and Environmental

Education/Training

Question No. 1: Does a safety, health, and environmental education/training program exist?

To verify, look for:

(a) education/training related funding amounts listed in ARMP documents;

(b) documentation (e.g., travel orders, certification) that the CDSO and others have been trained; and

(c) justification that external agencies (i.e., EPA, OSHA, universities, the State) have been onsite or conducted courses for the location.

Question No. 2: Are current safety, health, and environmental resource materials maintained?

To verify, look for:

(a) monthly trade magazines, periodicals, or publications;

(b) safety, health, and environmental related materials posted on the bulletin boards; and

(c) BNA Environment Reporter or other source materials.

Exhibit 1 (Continued)

Question No. 3: Do position descriptions/performance elements have safety, health, and environmental related elements?

To verify, look for:

(a) actual language in the position descriptions/performance elements, and

(b) delegation of authority/role/responsibility papers/letters.

Question No. 4: Are safety, health, and environmental orientation sessions conducted for new or transferred employees?

To verify, look for:

(a) a program outline;

(b) new employees and interview them;

(c) documents outlining hazardous areas within the facility, standard operating procedures, accident reporting procedures, and hazard reporting procedures; and

(d) employees signatures acknowledging receipt of training.

Question No. 5: Is an incentive program for improving safety, health, and environmental performance in place?

To verify, look for:

(a) an "awards" program (i.e., cash, certificate, letters of appreciation, etc.); and

(b) an employee's response to the question.

Component C - Safety, Health, and Environmental Services

Question No. 1: Does an Employee Assistance Program (EAP) exist?

To verify, look for:

(a) funding amounts in ARMP,

(b) formalized documents outlining program,

(c) the ARS MANUAL 230.0,

(d) the onsite EAP Coordinator (one is required to be in place), and

(e) an employee's response to the question. (Most locations contract for these services.)

Exhibit 1 (Continued)

Question No. 2: Do the Hazard Communication and the Community Right-to-Know Programs exist?

To verify, look for:

(a) plans for implementing the programs,

(b) recent chemical inventories,

(c) material safety data sheets (MSDS'),

(d) the availability of MSDS's to employees, and

(e) an employee's response to the question.

Question No. 3: Is a formalized written facility self-protection plan in place?

To verify, look for:

(a) a written plan outlining emergency procedures (i.e., for fire, weather, tornados, sickness, releases, etc.);

(b) posted fire/emergency escape routes (on every floor);

(c) fire protection/prevention systems (i.e., alarms, sprinklers);

(d) the program's relationship with local fire departments; and

(e) an employee's response to the question.

Question No. 4: Does an emergency program exist?

To verify, look for:

(a) emergency care stations (i.e., first aid stations/boxes);

(b) location personnel qualified in first aid (all shifts);

(c) evidence of periodical "emergency disaster drills;" and

(d) an employee's response to the question.

Question No. 5: Does an Occupational Health Maintenance Program (OHMP) exist?

To verify, look for:

(a) written procedures/policy statement,

(b) the ARS Directive/Manual,

(c) the amounts listed in the ARMP, and

(d) an employee's response to the question. (Most locations contract for these services.)

Exhibit 1 (Continued)

Question No. 6: Is there a program for solid and hazardous waste management?

To verify, look for:

(a) policies and procedures;

(b) hazardous waste identification activities and records;

(c) solid waste facilities; and

(d) evidence of proper hazardous waste storage, transportation, and disposal.

Question No. 7: Is there an underground storage tank management program?

To verify, look for:

(a) aboveground, onground, inground, and underground storage tank inventory;

(b) permits;

(c) leak-detection and monitoring devices/equipment;

(d) inventory control; and

(e) written filling, operation, and maintenance procedures.

Component D - Safety, Health, and Environmental Oversight

Question No. 1: Has a comprehensive Inspection/Abatement Program been implemented?

To verify, look for:

(a) inspection reports and abatement activity results (by the location/Area/Headquarters);

(b) evidence that the "inspectors" are trained;

(c) evidence that the identified deficiencies are given to engineering, maintenance, or FD for corrective action; and

(d) the frequency of the inspections (one time per year is required).

Question No. 2: Are safety, health, and environmental requirements taken into consideration during design/construction of facilities, equipment, and operations?

Exhibit 1 (Continued)

To verify, look for:

(a) HPRL requests,

(b) review comments to design/construction drawings,

(c) review comments to contracts, and

(d) presence of personal protective equipment (PPE) onsite during construction activities.

Question No. 3: Is applicable personal protective equipment and clothing (PPEC) available and its use mandated?

To verify, look for:

(a) a written program policy statement,

(b) language in position descriptions or standard operating procedures requiring the use of PPE to perform the task,

(c) proper orientation (training) on the use and maintenance of PPE,

(d) amounts budgeted in ARMP, and

(e) an employee's response to the question.

Question No. 4: Does a sign, label, poster program exist?

To verify, look for:

(a) evidence that all hazardous areas or areas containing hazardous materials (e.g., biosafety, radiation) are clearly marked;

(b) exit/means of egress signs;

(c) areas requiring PPE for chemicals, noise, dusts, mists, gases, vapors; and

(d) chemical labeling.

Component E - Safety, Health, and Environmental Evaluation

Question No. 1: Is the ARS accident/incident investigation and reporting program in place?

To verify, look for:

(a) accident/incident records (CA-1, injury; CA-2, illness);

(b) ARS MANUAL 230.0 procedures for investigating and reporting accidents/incidents;

(c) supervisors trained in accident investigation techniques;

(d) required OSHA accident posting requirements (log of accidents/illnesses);

Exhibit 1 (Continued)

(e) evidence of corrective action; and

(f) accident/illness frequency and severity rates.

Question No. 2: Are records of employee exposure to chemical, biological, or hazardous physical agents maintained?

To verify, look for:

(a) chemical, biological, or hazardous physical agents inventories;

(b) written notification of potentially hazardous conditions to employees from management;

(c) availability of MSDS; inventory standards to the employee; and

(d) OHMP results of employee physical.

Question No. 3: Is an annual program evaluation conducted?

To verify, look for:

(a) annual evaluation reports prepared by locations/Areas or Headquarters;

(b) ARMP entries of the State of the MU or location;

(c) annual goals/objectives published by the Area/location or MU; and

(d) management employee recommendations for program improvement (i.e., Safety Committee reports/recommendations, employee participation).

Question No. 4: Does an Office of Workers Compensation Program (OWCP) exist?

To verify, look for:

(a) Location efforts to compile and analyze OWCP cost data,

(b) written procedures for submitting claims,

(c) ARS MANUAL 230.0, and

(d) an individual assigned to perform duties.

Question No. 5: Does a safety, health, and environmental related statistical program exist?

Exhibit 1 (Continued)

To verify, look for:

tracking and use of information on costs, delivery, usage, effectiveness, and trends in OHMP, EAP, accident/illness, OWCP, design/construction, PPEC, training/education, incentives, hazard communication, Departmental hazardous waste funding, etc. The location will have to budget for

these items each year during ARMP's (actual expenditures should be tracked as part of the budgetary process; actual figures should be available).

Exhibit 2

Part II

Safety, Health, and Environmental Management Focus Program Review Criteria and Verification Statements

(Revised April 1993)

Program: Hazard Communication

Question 1: Has an inventory list of chemical and biological agents been completed?

To verify, look for:

(a) Locationwide or Areawide inventory list of chemical and biological agents

(b) designation of chemical/biological agents in inventories as hazardous or nonhazardous

(c) criteria/guidance for designation of chemical/biological agents as hazardous or not

(d) a coordinator or point of contact for the inventory

Question 2: Are MSDS files in existence, complete, and accessible to employees?

To verify, look for:

(a) MSDS' available for all hazardous chemical and biological agents in inventory

(b) request for MSDS' included in procurements of chemical and biological agents

(c) procedures in place to determine whether MSDS needed for chemical/biological agents synthesized or acquired through non-commercial channels

(d) MSDS' are organized and readily accessible to employees

(e) employees know of existence and location of MSDS'

Question 3: Are containers of hazardous chemical/biological agents properly labeled?

To verify, look for:

(a) hazardous chemical and biological agents have labels

(b) labeling is consistent with hazard criteria and Area or location procedures/guidance

Exhibit 2 (Continued)

Question 4: Have employees and supervisors been trained in hazard communication procedures/program?

To verify, look for:

(a) written training program exists

(b) training includes:

-provisions of hazard communication standard, program

-location/availability of the written program

-methods to detect presence or release of agent

-environmental/medical monitoring available

-physical and health hazards of agents used

-protective measures/response available, to be used

-labeling system and information sources

(c) records of employee training, including subjects, dates, and satisfactory completion

Program: Hazardous Chemicals Standard, or Chemical Hygiene

Question 1: Is adequate written chemical hygiene (CH) plan in existence and available?

To verify, look for:

(a) plan contains sections on standard operating procedures, exposure determinations, fume hoods and other engineering controls, information and training, medical consultation and exams, designation of chemical hygiene officer, incident response, and additional employee protection for particularly hazardous chemicals

(b) copies of plan are available to supervisors and employees

(c) supervisors/employees aware of/familiar with CH plan contents, their responsibilities

(d) a coordinator or point of contact for the CH program

Question 2: Are employees given information and training on CH plan/program/procedures?

To verify, look for:

(a) procedures/records of training when first assigned, or when duties/procedures changed

(b) information includes CH regulation, location and availability of the CH plan, permissible exposure limits, signs/symptoms of exposure, location and availability of reference material

Exhibit 2 (Continued)

(c) syllabus of training includes methods of detecting releases, physical/health hazards of chemicals, protective measures, personal protective equipment, emergency procedures, and the CH plan

(d) employees familiar with plan/program

Question 3: Is workplace monitoring performed according to CH plan?

To verify, look for:

(a) employee exposure determinations up to date

(b) criteria to trigger and end incident-specific and periodic monitoring exist

(c) employees receive results of monitoring

Question 4: Are medical consultation/examinations available and performed per the CH plan?

To verify, look for:

(a) medical attention available if employees develop signs or symptoms of exposure, if monitoring indicates potential for overexposure, or after spill

(b) licensed occupational health or preventive health physician performs exams and gives opinions

(c) physician gets information on chemicals employee may be exposed to, work description, descriptions of signs and symptoms of exposure

(d) employees know of services available, rights, and triggers for medical consultation/examinations

Question 5: Are chemical hazards in the workplace identified/evaluated?

To verify, look for:

(a) chemical containers are labelled with hazards

(b) provisions for evaluating chemicals developed in laboratory or obtained from noncommercial sources exist and are followed

(c) supervisors and employees familiar with/aware of hazards and procedures for identifying/evaluating

Exhibit 2 (Continued)

Question 6: Does a respirator program exist?

To verify, look for:

(a) written plan

(b) selection/maintenance criteria established/trained

(c) equipment in plan in stock, good condition

(d) supervisors and employees familiar with respiratory program

Question 7: Are records kept in accordance with CH plan?

To verify, look for:

(a) monitoring results records

(b) medical records

(c) training records

Program: Community Right-To-Know (CRTK)

Question 1: Have notifications and MSDS' been provided to State/local emergency planning committees (EPC's), when applicable (40 CFR 355 and 40 CFR 370)?

To verify, look for:

(a) chemical inventory identifies extremely hazardous chemicals present at location in excess of threshold planning quantity and reportable quantity

(b) up-to-date lists/MSDS' provided to EPC, if applicable

(c) coordinator or point of contact for CRTK program

(d) notifications of "continuous and stable" or other releases from (entire) facility (40 CFR 355.40)

Question 2: Have annual submissions (Tier I (March 1) or Tier II (30 days after requested)) been filed, when applicable or requested (40 CFR 370.20)?

To verify, look for:

(a) requests, correspondence, and transmittals

(b) coordinator or point of contact for CRTK program

Exhibit 2 (Continued)

Question 3: Is public access and availability provided for required information?

To verify, look for:

(a) written list of information for public access/availability requests from State/local EPC or fire department

(b) procedures/records showing responsiveness to access/availability requests/public use

Program: Hazardous Waste (HW) Generator Standards

Question 1: Do written plans/procedures for HW determination and waste analysis (40 CFR 262.11) exist, and is HW generator classification under both Federal and State regs documented?

To verify, look for:

(a) written plans/procedures

(b) records of HW determinations, waste analyses

(c) documentation of monthly HW generation and generator classification

(d) employee familiarity with procedures

Remainder of questions apply only if hazardous waste is/was generated.

Question 2: Does location have EPA/State HW identification number (40 CFR 262.12)?

To verify, look for:

(a) up-to-date EPA Form 8700-12 and/or State equivalent

(b) EPA identification number

Question 3: Are HW shipments manifested, if required (40 CFR 262, Subpart B)?

To verify, look for:

(a) manifest records

(b) manifest records are complete and up to date

Exhibit 2 (Continued)

Question 4: Are hazardous wastes properly accumulated and stored (time and quantity limits) (40 CFR 262, Subpart C)?

To verify, look for:

(a) written procedures for accumulation of HW, use/management/marking/labeling of containers, handling, and removal/treatment/disposal

(b) facility meets standards for accumulation, temporary storage

(c) inspections are performed and records are kept

(d) personnel involved in HW determination, accumulation, manifesting, inspection, shipment, and

recordkeeping are formally assigned responsibility and have at least basic training in RCRA requirements

(e) hazardous waste labels with accumulation start dates, etc., on containers, and containers are properly selected and managed

(f) no hazardous wastes present for more than 90, 180, or 270 days, as applicable

(g) records of inspections, training, generation, and accumulation are up to date and accurate

(h) employees familiar with HW accumulation and temporary storage requirements and location/Area procedures for HW determination and management

Question 5: Are required records kept (40 CFR 262,

Subpart D)?

To verify, look for:

(a) manifest records

(b) biennial reports, if applicable

(c) exception or other reports

Question 6: Are hazardous waste requirements for exporters or importers of hazardous waste met, if applicable (40 CFR 262, Subparts E and F)?

To verify, look for:

(a) manifests showing non-U.S. destination or origin of hazardous waste

Exhibit 2 (Continued)

Question 7: Are preparedness/prevention and emergency/contingency plans, procedures, and equipment in place, to the extent applicable?

To verify, look for:

(a) facility emergency plans

(b) lists of equipment/supplies and equipment/supplies on the list present as indicated

Question 8: Is hazardous waste transported (offsite), improperly moved onsite, or treated, stored, or disposed onsite without a permit?

To verify, look for:

(a) transportation and treatment, storage, and disposal parts of location/Area's hazardous waste management plans/procedures

(b) consistency between generation and manifest records

Question 9: Are there written plans/procedures for minimizing generation and/or recycling of hazardous waste?

To verify, look for:

(a) pollution prevention plans/procedures

(b) recycling/recovery/reclamation plans/procedures